

# **Exhibit 4**

**From:** Anderson, Sean R.  
**Sent:** Wednesday, June 26, 2019 10:05 PM  
**To:** Kerry Mustico  
**Cc:** Lane, Thomas Patrick; Golinveaux, Jennifer A.; Buchanan, Tom; Jeff Gould  
**Subject:** RE: Sony/Cox - discovery correspondence

Kerry,

We are following up on this. Has Sony/ATV and EMI determined whether any works-in-suit are contained within the referenced database and, if so, are they willing to produce information relating to those works-in-suit, including related valuations?

Separately, have you agreed to inquire with the other plaintiff groups as to whether a similar type of document or database exists? If so, have you done so yet and are you willing to produce any responsive documents/information?

**Sean R. Anderson**

**Associate Attorney**

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**From:** Anderson, Sean R.  
**Sent:** Friday, June 21, 2019 2:29 PM  
**To:** 'Kerry Mustico' <Kerry@oandzlaw.com>  
**Cc:** Lane, Thomas Patrick <TLane@winston.com>; Golinveaux, Jennifer A. <JGolinveaux@winston.com>; Buchanan, Tom <TBuchana@winston.com>; Jeff Gould <Jeff@oandzlaw.com>  
**Subject:** RE: Sony/Cox - discovery correspondence

Kerry,

We would request information in the database that relates to the works-in-suit and for the entire time period available. Unless our understanding is mistaken, this should not pose any added burden. As stated in my email, we also request the valuations that relate to the works in suit.

Thanks,  
Sean

**Sean R. Anderson**

**Associate Attorney**

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**From:** Kerry Mustico <[Kerry@oandzlaw.com](mailto:Kerry@oandzlaw.com)>  
**Sent:** Thursday, June 20, 2019 10:04 PM  
**To:** Anderson, Sean R. <[SRanderson@winston.com](mailto:SRanderson@winston.com)>  
**Cc:** Lane, Thomas Patrick <[TLane@winston.com](mailto:TLane@winston.com)>; Golinveaux, Jennifer A. <[JGolinveaux@winston.com](mailto:JGolinveaux@winston.com)>; Buchanan, Tom <[TBuchana@winston.com](mailto:TBuchana@winston.com)>; Jeff Gould <[Jeff@oandzlaw.com](mailto:Jeff@oandzlaw.com)>  
**Subject:** Re: Sony/Cox - discovery correspondence

Sean,

We are considering your requests below and discussing them with our clients. To clarify, is Cox asking Sony/ATV to produce the entire "database" (assuming that's possible), or just as it pertains to Sony/ATV's works in suit? Also, what time period?

Kerry M. Mustico  
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**From:** "Anderson, Sean R." <[SRanderson@winston.com](mailto:SRanderson@winston.com)>  
**Date:** Wednesday, June 19, 2019 at 9:54 PM  
**To:** Kerry Mustico <[Kerry@oandzlaw.com](mailto:Kerry@oandzlaw.com)>, Jeff Gould <[Jeff@oandzlaw.com](mailto:Jeff@oandzlaw.com)>  
**Cc:** "Lane, Thomas Patrick" <[TLane@winston.com](mailto:TLane@winston.com)>, "Golinveaux, Jennifer A." <[JGolinveaux@winston.com](mailto:JGolinveaux@winston.com)>, "Buchanan, Tom" <[TBuchana@winston.com](mailto:TBuchana@winston.com)>  
**Subject:** Sony/Cox - discovery correspondence

Kerry,

Anish Patel testified yesterday that Sony/ATV and EMI maintains a database of termination notices pursuant to 17 U.S.C. §§ 203, 304. Mr. Patel further testified that in connection with these notices, Sony/ATV and EMI may have the "valuation" department value the compositions subject to the termination notice. These documents are squarely responsive to Cox's requests for documents relating to both challenges to Plaintiffs' rights to the works-in-suit and their valuation. RFP Nos. 16, 18 and 32.

We demand that Sony/ATV and EMI immediately produce this database and all valuations for any of the works-in-suit, as it is clear that the database is readily available and any corresponding valuations should be as well. We also demand that each other plaintiff group agree to search for and produce any such documents.

Given that documents relating to challenges and valuations were requested in November and discovery closes in less than two weeks, we need a response by end of day tomorrow. Separately, please also let us know by end of day tomorrow whether Plaintiffs will be producing the documents requested in my June 10<sup>th</sup> email.

**Sean R. Anderson**

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